



State Water Resources Control Board

Division of Drinking Water

January 4, 2017 System No. 5410017

Board of Directors London Community Services District 37835 Kate Road Dinuba, CA 93618

Citation No. 03_12 16C 029 RE:

Total Coliform Maximum Contaminant Level Violation

For September 2016

Dear Board of Directors:

Enclosed is a Citation issued to the London Community Services District (hereinafter "Water System") public water system.

The Water System will be billed at the State Water Resources Control Board's (hereinafter "State Board") hourly rate (currently estimated at (\$161.00) for the time spent on issuing this citation. California Health and Safety Code, Section 116577, provides that a public water system must reimburse the State Board for actual costs incurred by the State Board for specified enforcement actions, including but not limited to, preparing, issuing and monitoring compliance with a citation. The Water System will receive a bill sent from the State Board in August of the next fiscal year. This bill will contain fees for any enforcement time spent on the Water System for the current fiscal year.

If you have any questions regarding this matter, please contact me at (559) 447-3300.

Sincerely.

Tricia A. Wathen, P.E.

Senior Sanitary Engineer, Visalia District SOUTHERN CALIFORNIA BRANCH

DRINKING WATER FIELD OPERATIONS

TAW/LR **Enclosures**

Certified Mail No. 7016 2070 0000 4896 3490

Mr. Luis Garcia, U.S. EPA Region IX, 75 Hawthorne St., San Francisco, CA 94105

Tulare County Environmental Health Department

Mr. Matt Gomes, California Water Services, P. O. Box 343, Coalinga, CA 93210

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STATE OF CALIFORNIA

STATE WATER RESOURCES CONTROL BOARD

DIVISION OF DRINKING WATER

Name of Public Water System: London Community Services District

Water System No: 5410017

Attention: Board of Directors

37835 Kate Road

Dinuba, CA 93618

January 4, 2017

CITATION FOR NONCOMPLIANCE

TOTAL COLIFORM MAXIMUM CONTAMINANT LEVEL VIOLATION

CALIFORNIA CODE OF REGULATIONS, TITLE 22, SECTION 64426.1

September 2016

The California Health and Safety Code (hereinafter "CHSC"), Section 116650 authorizes the State Water Resources Control Board (hereinafter "State Board") to issue a citation to a public water system when the State Board determines that the public water system has violated or is violating the California Safe Drinking Water Act (hereinafter "California SDWA"), (CHSC, Division 104, Part 12, Chapter 4, commencing with Section 116270), or any regulation, standard, permit, or order issued or adopted thereunder.

The State Board, acting by and through its Division of Drinking Water (hereinafter "Division") and the Deputy Director for the Division, hereby issues this citation pursuant to Section 116650 of the CHSC to the London Community Services District (hereinafter "Water System") for violation of CHSC, Section 116555(a)(1) and California Code of Regulations (hereinafter "CCR"), Title 22, Section 64426.1.

A copy of the applicable statutes and regulations are included in Appendix 1, which is attached hereto and incorporated by reference.

STATEMENT OF FACTS

The Water System is classified as a community water system with a population of approximately 2,138 persons, served through 439 service connections. The Water System is required to collect a minimum of two (2) distribution system bacteriological samples per month. The Division received laboratory results for fifteen (15) bacteriological samples collected during September 2016 from the Water System. All samples were analyzed for the presence of total coliform bacteria. Eight (8) of the fifteen (15) samples analyzed were positive for total coliform bacteria. None of the total coliform positive samples showed the presence of *Escherichia coli* (*E. coli*) bacteria. All water samples for coliform bacteria are summarized in Appendix 2 and 3.

Pursuant to the Federal Revised Total Coliform Rule (FRTCR), a Level 2 Assessment is triggered whenever a water system has a minimum of two Total Coliform Maximum Contaminant Level (TCR MCL) failures within a 12 month period. The Division began implementing the FRTCR on April 1, 2016. The Water System previously failed to meet the TCR MCL in the month of June 2016. Accordingly, a Level 2 assessment was conducted by Division of Drinking Water staff on September 21, 2016. As a result of the assessment, a number of deficiencies were found that could have potentially contributed to the presence of total coliform bacteria. These are noted in the Division's letter to the Water System in Appendix 4.

DETERMINATION

CCR, Title 22, Section 64426.1, Total Coliform Maximum Contaminant Level (MCL) states that a public water system is in violation of the total coliform MCL if it collects fewer than 40 bacteriological samples per month and if more than one sample collected during any month is total coliform-positive.

The Water System took fewer than 40 bacteriological samples during September 2016. The

results of eight (8) routine samples were total coliform positive. Therefore, the Division has

determined that the Water System failed to comply with CCR, Title 22, Section 64426.1 during

September 2016.

DIRECTIVES

The Water System is hereby directed to take the following actions:

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1. Comply with CCR, Title 22, Section 64426.1, in all future monitoring periods.

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2. On or before January 20, 2017, notify all persons served by the Water System of the violation of Section 64426.1, in conformance with CCR, Title 22, Sections 64463.4(b)&(c) and 64465. Copies of Sections 64463.4 and 64465 are included in Appendix 1. Appendix 5: Public Notification Template shall be used to fulfill this directive,

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unless otherwise approved by the Division.

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3. Complete Appendix 6: Compliance Certification Form. Submit it together with a copy of the public notification to the Division on or before January 30, 2017.

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4. The Water System shall include this violation in the 2016 Consumer Confidence Report due to the Water System's customers by July 1, 2017 in accordance with CCR, Title 22, Section 64481(q)(1).

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1	All submittals required by this Citation shall be electronically submitted to the Division at the
2	following address. The subject line for all electronic submittals corresponding to this citation
3	shall include the following information: Water System name and number, citation number and
4	title of the document being submitted.
5	
6	Tricia A. Wathen, P.E., Senior Sanitary Engineer
7	State Water Resources Control Board
8	Division of Drinking Water, Visalia District
9	265 W. Bullard Ave, Suite 101
10	Fresno, CA 93704
11	Dwpdist12@waterboards.ca.gov
12	
13	The State Board reserves the right to make such modifications to this Citation as it may deem
14	necessary to protect public health and safety. Such modifications may be issued as
15	amendments to this Citation and shall be effective upon issuance.
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17	Nothing in this Citation relieves the Water System of its obligation to meet the requirements of
18	the California SDWA (CHSC, Division 104, Part 12, Chapter 4, commencing with Section
19 20	116270), or any regulation, standard, permit or order issued or adopted thereunder.
21	PARTIES BOUND
22	This Citation shall apply to and be binding upon the Water System, its owners, shareholders
23	officers, directors, agents, employees, contractors, successors, and assignees.
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25	SEVERABILITY
26	The directives of this Citation are severable, and the Water System shall comply with each and
27	every provision thereof notwithstanding the effectiveness of any provision.
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FURTHER ENFORCEMENT ACTION

The California SDWA authorizes the State Board to: issue a citation or order with assessment of administrative penalties to a public water system for violation or continued violation of the requirements of the California SDWA or any regulation, permit, standard, citation, or order issued or adopted thereunder including, but not limited to, failure to correct a violation identified in a citation or compliance order. The California SDWA also authorizes the State Board to take action to suspend or revoke a permit that has been issued to a public water system if the public water system has violated applicable law or regulations or has failed to comply with an order of the State Board, and to petition the superior court to take various enforcement measures against a public water system that has failed to comply with an order of the State Board. The State Board does not waive any further enforcement action by issuance of this Citation.

Tricia Wathen, P.E.

Senior Sanitary Engineer, Visalia District
DRINKING WATER FIELD OPERATIONS BRANCH

19 Appendices (6):

- 20 1. Applicable Statutes and Regulations
- 21 2. Summary of Distribution Bacteriological Samples
- 22 3. Summary of Source Bacteriological Samples
- 23 4. Notification Template for September 2016
- 24 5. Compliance Certification Form
 - 6. Level 2 Assessment Report

Certified Mail No. 7016 2070 0000 4896 3490



APPENDIX 1. Applicable Statutes and Regulations for Citation No. 03 12 16C 029

NOTE: The following language is provided for the convenience of the recipient, and cannot be relied upon as the State of California's representation of the law. The published codes are the only official representation of the law. Regulations related to drinking water are in Titles 22 and 17 of the California Code of Regulations. Statutes related to drinking water are in the Health & Safety Code, the Water Code, and other codes.

California Health and Safety Code (CHSC):

Section 116271 states in relevant part:

- (a) The State Water Resources Control Board succeeds to and is vested with all of the authority, duties, powers, purposes, functions, responsibilities, and jurisdiction of the State Department of Public Health, its predecessors, and its director for purposes of all of the following:
 - (1) The Environmental Laboratory Accreditation Act (Article 3 (commencing with Section 100825) of Chapter 4 of Part 1 of Division 101).
 - (2) Article 3 (commencing with Section 106875) of Chapter 4 of Part 1.
 - (3) Article 1 (commencing with Section 115825) of Chapter 5 of Part 10.
 - (4) This chapter and the Safe Drinking Water State Revolving Fund Law of 1997 (Chapter 4.5 (commencing with Section 116760)).
 - (5) Article 2 (commencing with Section 116800), Article 3 (commencing with Section 116825), and Article 4 (commencing with Section 116875) of Chapter 5.
 - (6) Chapter 7 (commencing with Section 116975).
 - (7) The Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Bond Act of 2006 (Division 43 (commencing with Section 75001) of the Public Resources Code).
 - (8) The Water Recycling Law (Chapter 7 (commencing with Section 13500) of Division 7 of the Water Code).
 - (9) Chapter 7.3 (commencing with Section 13560) of Division 7 of the Water Code.
 - (10) The California Safe Drinking Water Bond Law of 1976 (Chapter 10.5 (commencing with Section 13850) of Division 7 of the Water Code).
 - (11) Wholesale Regional Water System Security and Reliability Act (Division 20.5 (commencing with Section 73500) of the Water Code).
 - (12) Water Security, Clean Drinking Water, Coastal and Beach Protection Act of 2002 (Division 26.5 (commencing with Section 79500) of the Water Code).
- (b) The State Water Resources Control Board shall maintain a drinking water program and carry out the duties, responsibilities, and functions described in this section. Statutory reference to "department," "state department," or "director" regarding a function transferred to the State Water Resources Control Board shall refer to the State Water Resources Control Board. This section does not impair the authority of a local health officer to enforce this chapter or a county's election not to enforce this chapter, as provided in Section 116500...
- (k) (1) The State Water Resources Control Board shall appoint a deputy director who reports to the executive director to oversee the issuance and enforcement of public water system permits and other duties as appropriate. The deputy director shall have public health expertise.
 - (2) The deputy director is delegated the State Water Resources Control Board's authority to provide notice, approve notice content, approve emergency notification plans, and take other action pursuant to Article 5 (commencing with Section 116450), to issue, renew, reissue, revise, amend, or deny any public water system permits pursuant to Article 7 (commencing with Section 116525), to suspend or revoke any public water system permit pursuant to Article 8 (commencing with Section 116625), and to issue citations, assess penalties, or issue orders pursuant to Article 9 (commencing with Section 116650). Decisions and actions of the deputy director taken pursuant to Article 5 (commencing with Section 116450) or Article 7 (commencing with Section 116525) are deemed decisions and actions taken, but are not subject to reconsideration, by the State Water Resources Control Board. Decisions and actions of the deputy director taken pursuant to Article 8 (commencing with Section 116650) are deemed decisions and actions taken by the State Water Resources Control Board, but any aggrieved person may petition the State Water Resources Control Board for reconsideration of the decision or action. This subdivision is not a limitation on the State Water Resources Control Board's authority to delegate any other powers and duties.

Section 116555 states in relevant part:

- (a) Any person who owns a public water system shall ensure that the system does all of the following:
 - (1) Complies with primary and secondary drinking water standards.
 - (2) Will not be subject to backflow under normal operating conditions.
 - (3) Provides a reliable and adequate supply of pure, wholesome, healthful, and potable water.

Section 116650 states in relevant part:

- (a) If the state board determines that a public water system is in violation of this chapter or any regulation, permit, standard, citation, or order issued or adopted thereunder, the state board may issue a citation to the public water system. The citation shall be served upon the public water system personally or by certified mail. Service shall be deemed effective as of the date of personal service or the date of receipt of the certified mail. If a person to whom a citation is directed refuses to accept delivery of the certified mail, the date of service shall be deemed to be the date of mailing.
- (b) Each citation shall be in writing and shall describe the nature of the violation or violations, including a reference to the statutory provision, standard, order, citation, permit, or regulation alleged to have been violated.
- (c) A citation may specify a date for elimination or correction of the condition constituting the violation.
- (d) A citation may include the assessment of a penalty as specified in subdivision (e).
- (e) The state board may assess a penalty in an amount not to exceed one thousand dollars (\$1,000) per day for each day that a violation occurred, and for each day that a violation continues to occur. A separate penalty may be assessed for each violation and shall be in addition to any liability or penalty imposed under any other law.

California Code of Regulations, Title 22 (CCR):

Section 64421 (General Requirements) states:

- (a) Each water supplier shall:
 - (1) Develop a routine sample siting plan as required in section 64422;
 - (2) Collect routine, repeat and replacement samples as required in Sections 64423, 64424, and 64425;
 - (3) Have all samples analyzed by laboratories approved to perform those analyses by the State Board and report results as required in section 64423.1;
 - (4) Notify the State Board when there is an increase in coliform bacteria in bacteriological samples as required in section 64426; and
 - (5) Comply with the Maximum Contaminant Level as required in section 64426.1.
- (b) Water suppliers shall perform additional bacteriological monitoring as follows:
 - (1) After construction or repair of wells;
 - (2) After main installation or repair;
 - (3) After construction, repair, or maintenance of storage facilities; and
 - (4) After any system pressure loss to less than five psi. Samples collected shall represent the water quality in the affected portions of the system.

Section 64426.1 (Total Coliform Maximum Contaminant Level (MCL)) states in relevant part:

- (b) A public water system is in violation of the total coliform MCL when any of the following occurs:
 - (1) For a public water system which collects at least 40 samples per month, more than 5.0 percent of the samples collected during any month are total coliform-positive; or
 - (2) For a public water system which collects fewer than 40 samples per month, more than one sample collected during any month is total coliform-positive; or
 - (3) Any repeat sample is fecal coliform-positive or E. coli-positive; or
 - (4) Any repeat sample following a fecal coliform-positive or E. coli-positive routine sample is total coliform-positive.
- (c) If a public water system is not in compliance with paragraphs (b)(1) through (4), during any month in which it supplies water to the public, the water supplier shall notify the State Board by the end of the business day on which this is determined, unless the determination occurs after the State Board office is closed, in which case the supplier shall notify the State Board within 24 hours of the determination. The water supplier shall also notify the consumers served by the water system. A Tier 2 Public Notice shall be given for violations of paragraph (b)(1) or (2), pursuant to section 64463.4. A Tier 1 Public Notice shall be given for violations of paragraph (b)(3) or (4), pursuant to section 64463.1.

Section 64463.4 (Tier 2 Public Notice) states:

- (a) A water system shall give public notice pursuant to this section if any of the following occurs:
 - (1) Any violation of the MCL, MRDL, and treatment technique requirements, except:
 - (A) Where a Tier 1 public notice is required under section 64463.1; or
 - (B) Where the State Board determines that a Tier 1 public notice is required, based on potential health impacts and persistence of the violations;
 - (2) All violations of the monitoring and testing procedure requirements in sections 64421 through 64426.1, article 3 (Primary Standards Bacteriological Quality), for which the State Board determines that a Tier 2 rather than a Tier 3 public notice is required, based on potential health impacts and persistence of the violations:
 - (3) Other violations of the monitoring and testing procedure requirements in this chapter, and chapters 15.5, 17 and 17.5, for which the State Board determines that a Tier 2 rather than a Tier 3 public notice is required, based on potential health impacts and persistence of the violations; or
 - (4) Failure to comply with the terms and conditions of any variance or exemption in place.

- (b) A water system shall give the notice as soon as possible within 30 days after it learns of a violation or occurrence specified in subsection (a), except that the water system may request an extension of up to 60 days for providing the notice. This extension would be subject to the State Board's written approval based on the violation or occurrence having been resolved and the State Board's determination that public health and welfare would in no way be adversely affected. In addition, the water system shall:
 - (1) Maintain posted notices in place for as long as the violation or occurrence continues, but in no case less than seven days;
 - (2) Repeat the notice every three months as long as the violation or occurrence continues. Subject to the State Board's written approval based on its determination that public health would in no way be adversely affected, the water system may be allowed to notice less frequently but in no case less than once per year. No allowance for reduced frequency of notice shall be given in the case of a total coliform MCL violation or violation of a Chapter 17 treatment technique requirement; and
 - (3) For turbidity violations pursuant to sections 64652.5(c)(2) and 64653(c), (d) and (f), as applicable, a water system shall consult with the State Board as soon as possible within 24 hours after the water system learns of the violation to determine whether a Tier 1 public notice is required. If consultation does not take place within 24 hours, the water system shall give Tier 1 public notice within 48 hours after learning of the violation.
- (c) A water system shall deliver the notice, in a manner designed to reach persons served, within the required time period as follows:
 - (1) Unless otherwise directed by the State Board in writing based on its assessment of the violation or occurrence and the potential for adverse effects on public health and welfare, community water systems shall give public notice by;
 - (A) Mail or direct delivery to each customer receiving a bill including those that provide their drinking water to others (e.g., schools or school systems, apartment building owners, or large private employers), and other service connections to which water is delivered by the water system; and
 - (B) Use of one or more of the following methods to reach persons not likely to be reached by a mailing or direct delivery (renters, university students, nursing home patients, prison inmates, etc.):
 - 1. Publication in a local newspaper;
 - 2. Posting in conspicuous public places served by the water system, or on the Internet; or
 - 3. Delivery to community organizations.
 - (2) Unless otherwise directed by the State Board in writing based on its assessment of the violation or occurrence and the potential for adverse effects on public health and welfare, noncommunity water systems shall give the public notice by:
 - (A) Posting in conspicuous locations throughout the area served by the water system; and
 - (B) Using one or more of the following methods to reach persons not likely to be reached by a public posting:
 - 1. Publication in a local newspaper or newsletter distributed to customers;
 - 2. E-mail message to employees or students;
 - 3. Posting on the Internet or intranet; or
 - 4. Direct delivery to each customer.

Section 64465 (Public Notice Content and Format) states in relevant part:

- (a) Each public notice given pursuant to this article, except Tier 3 public notices for variances and exemptions pursuant to subsection (b), shall contain the following:
 - (1) A description of the violation or occurrence, including the contaminant(s) of concern, and (as applicable) the contaminant level(s);
 - (2) The date(s) of the violation or occurrence;
 - (3) Any potential adverse health effects from the violation or occurrence, including the appropriate standard health effects language from appendices 64465-A through G;
 - (4) The population at risk, including subpopulations particularly vulnerable if exposed to the contaminant in drinking water:
 - (5) Whether alternative water supplies should be used:
 - (6) What actions consumers should take, including when they should seek medical help, if known;
 - (7) What the water system is doing to correct the violation or occurrence;
 - (8) When the water system expects to return to compliance or resolve the occurrence;
 - (9) The name, business address, and phone number of the water system owner, operator, or designee of the water system as a source of additional information concerning the public notice;
 - (10) A statement to encourage the public notice recipient to distribute the public notice to other persons served, using the following standard language: —Please share this information with all the other people who drink this water, especially those who may not have received this public notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this public notice in a public place or distributing copies by hand or mail; and
 - (11) For a water system with a monitoring and testing procedure violation, this language shall be included: "We are required to monitor your drinking water for specific contaminants on a regular basis. Results of regular monitoring are an indicator of whether or not your drinking water meets health standards. During

[compliance period dates], we ['did not monitor or test' or 'did not complete all monitoring or testing'] for [contaminant(s)], and therefore, cannot be sure of the quality of your drinking water during that time." ... (c) A public water system providing notice pursuant to this article shall comply with the following multilingual-related requirements:

(2) For a Tier 2 or Tier 3 public notice:

- (A) The notice shall contain information in Spanish regarding the importance of the notice, or contain a telephone number or address where Spanish-speaking residents may contact the public water system to obtain a translated copy of the notice or assistance in Spanish; and
- (B) When a non-English speaking group other than Spanish-speaking exceeds 1,000 residents or 10 percent of the residents served by the public water system, the notice shall include:
 - 1. Information in the appropriate language(s) regarding the importance of the notice; or
 - 2. A telephone number or address where such residents may contact the public water system to obtain a translated copy of the notice or assistance in the appropriate language; and
- (3) For a public water system subject to the Dymally-Alatorre Bilingual Services Act, Chapter 17.5, Division 7, of the Government Code (commencing with section 7290), meeting the requirements of this Article may not ensure compliance with the Dymally-Alatorre Bilingual Services Act.

(d) Each public notice given pursuant to this article shall:

- (1) Be displayed such that it catches people's attention when printed or posted and be formatted in such a way that the message in the public notice can be understood at the eighth-grade level;
- (2) Not contain technical language beyond an eighth-grade level or print smaller than 12 point; and
- (3) Not contain language that minimizes or contradicts the information being given in the public notice.

Appendix 64465-A. Health Effects Language - Microbiological Contaminants.

Contaminant	Health Effects Language
Total Coliform	Coliforms are bacteria that are naturally present in the environment and are used as an indicator that other, potentially-harmful, bacteria may be present. Coliforms were found in more samples than allowed and this was a warning of potential problems.
Fecal coliform/E. coli	Fecal coliforms and E. coli are bacteria whose presence indicates that the water may be contaminated with human or animal wastes. Microbes in these wastes can cause short-term effects, such as diarrhea, cramps, nausea, headaches, or other symptoms. They may pose a special health risk for infants, young children, some of the elderly, and people with severely compromised immune systems.
Turbidity	Turbidity has no health effects. However, high levels of turbidity can interfere with disinfection and provide a medium for microbial growth. Turbidity may indicate the presence of disease-causing organisms. These organisms include bacteria, viruses, and parasites that can cause symptoms such as nausea, cramps, diarrhea, and associated headaches.

Section 64469 (Reporting Requirements) states in relevant part:

(d) Within 10 days of giving initial or repeat public notice pursuant to Article 18 of this Chapter, except for notice given under section 64463.7(d), each water system shall submit a certification to the State Board that it has done so, along with a representative copy of each type of public notice given.

Section 64481 (Content of the Consumer Confidence Report) states in relevant part:

- (g) For the year covered by the report, the Consumer Confidence Report shall note any violations of paragraphs (1) through (7) and give related information, including any potential adverse health effects, and the steps the system has taken to correct the violation.
 - (1) Monitoring and reporting of compliance data.

Bacteriological Distribution Monitoring Report

5410017	London	Community Serv Dist	Distribution System Freq: 2/M
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Sample Date	Location	T Coli	E Coli	F Coli	HPC	Туре	Cl2	Cl2 Avg	Viol. Type	GWR Satisfied?	Comments
10/5/2016	5 samples	<1.1	<1.1			Routine					
9/23/2016	4 samples (same sites as 9/19/16)	<1.1	<1.1			Repeat					
9/19/2016	37743 Rd 60	6.9	<1.1			Repeat					
9/19/2016	37791 Rd 60	1.1	<1.1			Repeat					
9/19/2016	37703 Rd 60	5.1	<1.1			Repeat					
9/16/2016	37992 Kate Rd	5.1	<1.1			Repeat					
9/11/2016	4 samples	<1.1	<1.1			Repeat					
9/11/2016	37992 Kate Rd	1.1	<1.1			Repeat					
9/9/2016	37743 Rd 60	2.2	<1.1			Repeat					
9/9/2016	37791 Rd 60	1.1	<1.1			Repeat			MCL	Yes	
9/9/2016	37703 Rd 60	<1.1	<1.1			Repeat					
9/9/2016	37992 Kate Rd	1.1	<1.1			Repeat					
9/7/2016	37736 Rd 58	<1.1	<1.1			Routine					

Violation Key

MCL	Exceeds Maximum Contaminant Level (L1 RTCR)	GWR	Tier 1 or Tier 2 notification req'd
MR1	No monthly sample for the report month	GR1	GWR M&R violation
MR2	No quarterly sample for the report quarter	L1	Level 1 Trigger RTCR (TCRMCL)
MR3	Incorrect number of routine samples for the report month	L2a	Level 2-EC+ Routine w/TC+Repeat
MR4	Did not collect 5 routine samples for previous month's positive sample	L2b	Level 2-TC+ Routine w/EC+ Repeat
MR5	Incorrect number of repeat samples as follow-up to a positive sample	L2c	Level 2-EC+ Routine w/No Repeats
MR6	No source sample	L2d	Level 2-Repeat at GWR source monitoring is EC+
MR7	No summary report submitted	L2e	Level 2-Two (2) Level 1 Triggers in a 12-month period
MR8	Other comments and/or info		

Source Bacteriological Monitoring Report

5410017 London Community Serv Dist

Sample Date	Time	Source	Sample Type	Test Method	T Coli	E Coli	F Coli	НРС	Violation	Comments
9/23/2016		Wells: 2A & 4	Well	MPN	<1.1	<1.1				
9/19/2016	11:00	Well 2	Well	MPN	5.1	<1.1				
9/19/2016	11:15	Well 4	Well	MPN	<1.1	<1.1				
9/11/2016	13:29	Well 2A	Well	MPN	<1.1	<1.1				
9/9/2016		Wells:2A & 4	Well	MPN	<1.1	<1.1				
7/13/2016		Wells: 2,3,4	Well	MPN	<1.1	<1.1				
6/13/2016		Wells 2A & 4	GWR Well	MPN	<1.1	<1.1				
6/6/2016	13:20	Well 3	GWR Well	MPN	<1.1	<1.1				
6/6/2016	13:30	Well 4	GWR Well	MPN	>23	<1.1				
6/6/2016	13:45	Well 2A	GWR Well	MPN	<1.1	<1.1				
6/3/2016	17:42	Well 4	GWR Well	MPN	<1.1	<1.1				
6/3/2016	18:10	Well 2A	GWR Well	MPN	1.1	<1.1				
6/3/2016	18:25	Well 3	GWR Well	MPN	<1.1	<1.1				
5/16/2016	15:18	Well 3	Well	MPN		<1.1				

APPENDIX 4. NOTIFICATION TEMPLATE

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER Este informe contiene informacion muy importante sobre su agua potable. Por favor hable con alguien que lo pueda tradúcir.

London Community Services District Had Levels of Coliform Bacteria Above the Drinking Water Standard

Our water system recently failed a drinking water standard. Although this incident was not an emergency, as our customers, you have a right to know what you should do, what happened and what we did to correct this situation.
We routinely monitor for drinking water contaminants. We took[Insert number of samples] samples to test for the presence of coliform bacteria in September 2016[Insert Number positive] of these samples showed the presence of total coliform bacteria. The standard is that no more than 1 sample per month may show the presence of coliform bacteria.

What should I do?

- You do not need to boil your water or take other corrective actions.
- This is not an emergency. If it had been, you would have been notified immediately. Total coliform bacteria are generally not harmful themselves. Coliforms are bacteria which are naturally present in the environment and are used as an indicator that other; potentially-harmful, bacteria may be present. Coliforms were found in more samples than allowed and this was a warning of potential problems.
- Usually, coliforms are a sign that there could be a problem with the treatment or distribution system (pipes). Whenever we detect coliform bacteria in any sample, we do follow-up testing to see if other bacteria of greater concern, such as fecal coliform or *E.* coli, are present. We did not find any of these bacteria in our subsequent testing.
- People with severely compromised immune systems, infants, and some elderly may be at increased risk. These people should seek advice about drinking water from their health care providers. General guidelines on ways to lessen the risk of infection by microbes are available from EPA's Safe Drinking Water Hotline at 1(800) 426-4791.
- If you have other health issues concerning the consumption of this water, you may wish to consult your doctor.

What happened? What Describe action.]	is being	done?						. We	corrective anticipate
resolving the problem v	within					_[estir	mated time f	rame].	
For more information	n, pleas [insert			or	at	the	_[insert nar following		
			[ins	ert b	usine	ess/m	ailing addre	ss].	

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this public notice in a public place or distributing copies by hand or mail.

Secondary Notification Requirements

Upon receipt of notification from a person operating a public water system, the following notification must be given within 10 days [Health and Safety Code Section 116450(g)]:

- SCHOOLS: Must notify school employees, students, and parents (if the students are minors).
- RESIDENTIAL RENTAL PROPERTY OWNERS OR MANAGERS (including nursing homes and care facilities): Must notify tenants.
- BUSINESS PROPERTY OWNERS, MANAGERS, OR OPERATORS: Must notify employees of businesses located on the property.

This notice is being sent to you by London CSD.	Date distributed:	
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APPENDIX 5. COMPLIANCE CERTIFICATION

Citation Number: 03_12_16C_029

Name of Water System: London Community Services District

System Number: 5410017

Certification

I certify that the users of the water supplied by this water system were notified of the bacteriological violation of California Code of Regulations, Title 22, Section 64426.1 for the compliance period of September 2016 and the required actions listed below were completed.

Required Action	Date Completed
(Citation Directive 2) Public Notification Method(s) Used:	
Signature of Water System Representative	Date

Attach a copy of the public notice distributed to the water system's customers.

THIS FORM MUST BE COMPLETED AND RETURNED TO THE STATE BOARD, DIVISION OF DRINKING WATER, NO LATER THAN January 30, 2017

Disclosure: Be advised that the California Health and Safety Code, Sections 116725 and 116730 state that any person who knowingly makes any false statement on any report or document submitted for the purpose of compliance with the Safe Drinking Water Act may be liable for, respectively, a civil penalty not to exceed five thousand dollars (\$5,000) for each separate violation or, for continuing violations, for each day that violation continues, or be punished by a fine of not more than \$25,000 for each day of violation, or by imprisonment in the county jail not to exceed one year, or by both the fine and imprisonment.





State Water Resources Control Board Division of Drinking Water

September 29, 2016 System No.: 5410017

Board of Directors London Community Services District 37835 Kate Road Dinuba, CA 93618

Subject: June & September 2016 Total Coliform Rule Failure - Level 2 Assessment

Dear Board of Directors:

Effective April 1, 2016, the State Water Resources Control Board – Division of Drinking Water (Division) began implementing the Federal Revised Total Coliform Rule (FRTCR). Please visit the following web site for more information regarding the Federal RTCR:

http://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/rtcr.shtml

The Division was notified on September 12, 2016, that London Community Services District (Water System) water system failed to meet the Total Coliform Rule maximum contaminant level (MCL) failure for September 2016. The Water System had previously failed the TCR MCL for the month of June 2016 as well. Pursuant to the FRTCR, a Level 2 Assessment is triggered whenever a water system has a minimum of two TCR MCL failures within a 12 month period and requires that the Division conduct an assessment of the water system facilities to determine if any sanitary defects exists, and if found, inform the Water System to correct them.

In accordance with the FRTCR an onsite Level 2 assessment was conducted by Division staff on September 21, 2016, with Mr. Steven Reyes, shift contract operator from California Water Services. Upon completion of the Level 2 Assessment, the items listed below were found to be deficient and require correction. Photographs of the deficiencies are attached.

- 1. Install drainage for the packing gland for Well No. 02A, so that the water drains away from the well. Drill a hole at the base of the vertical turbine pump stand frame of Well No. 2A to allow drainage of standing water (current hole is located too high, and adequate drainage does not occur).
- 2. Seal the well head of Well No. 02A.
- 3. Replace the leaking check valve on the above-ground manifold of Well No. 02A.
- 4. Replace and install #24 mesh to screen the casing vent of Well No. 02A.

- 5. Install lock nut on electrical motor connection box located at Well No. 02A.
- 6. Paint the above-ground manifold of Well No. 02A.
- 7. By November 15, 2016, replace the corroded air relief of the hydropneumatic tank located at the Well No. 02A site.
- 8. Clean and inspect the interior of the hydropneumatic tank located at the Well No. 02A for any internal corrosion.
- 9. Come up with a plan and schedule to replace the hydropneumatic tank at the Well No. 02A site. At the time of the Level 2 assessment inspection, corrosion on the welding seam of the end cap of the hydropneumatic tank was identified.
- 10. Replace and install #24 mesh to screen the air relief of Well No. 04.
- 11. Replace and install #24 mesh to screen the blow-off of the hydropneumatic tank located at the Well No. 04 site.
- 12. By January 1, 2017, repair the hole in the concrete floor at Well No. 04 site.
- 13. Send the Division a copy of the most recent cross-connection survey conducted (2014).

The above action items need to be corrected and proof of completion and photographs of the corrections submitted to the Division no later than November 1, 2016. This letter will also serve to inform the US Environmental Protection Agency (EPA) of the violation and its associated deadlines. If you have any questions regarding this letter, please contact Ms. Shen Huang of my staff or me at (559) 447-3300.

Sincerely,

Tricia A. Wathen, P.E.

Senior Sanitary Engineer, Visalia District SOUTHERN CALIFORNIA BRANCH DRINKING WATER FIELD OPERATIONS

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TAW/SH Enclosures: Completed Level 2 Assessment for London CSD Photographs of Deficiencies

Mr. Luis Garcia, U.S. EPA Region IX, 75 Hawthorne St., San Francisco, CA 94105
 Tulare County Environmental Health Department
 Mr. Matt Gomes, contract chief operator, California Water Services

Mr. Steven Reyes, shift operator, California Water Services

Mr. Jim Wegley, Keller Wegley Engineering

REVISED TOTAL COLIFORM RULE (RTCR) — LEVEL 2 ASSESSMENT POWN This form is intended to assist public water systems in completing the investigation required by the federal revised Total Coliform Rule (rTCR) [effective April 1, 2016]. Local regulatory and the investigation required by the federal revised Total Coliform Rule (rTCR) [effective April 1, 2016]. Local regulatory agency (LPA) or Division of Drinking Water's District office will complete the Level 2 Assessment. To avoid a violation, an assessment report must be no later than 30 days after the trigger date.



PWS ID#: 5410017 PWS Name: London CSD		
Primary Operator (print name): Matt Gomes, Cal H2O Services Phone:559-250-5840 Assessment trigger date: 09/12/2016 SEASONAL: YES ☐ NO ☒	es Phone:559-250-5840 Date Assessment Completed: 09/20/2016 Reason for Assessment: Second Level 1 Coliform Treatment Technique Trioner Within 12 Months	eur Trianer Within 12 Manths
Assessment Elements	Issue Description	Corrective Action Taken or Planned to
	Indicate Element number being described	be Taken and Date
[Z		
pling?	7020 25 15 15 15 15 15 15 15 15 15 15 15 15 15	
1.3 Was this sample taken from an outside faucet?	ins from hate, enclosed taken	
1.4 Was the sample taken from a swivel tap?	Routh carelased + no lengs	
1.5 Did the tap have a point of use treatment device on it?	いろもついちなるという	
1.6 Does the building where the sample was taken have a Doint of entry device?	Los of Search Land	one and the second seco
ergone any plumbing	1 to Store browlets (100.000)	
oss connections around the	ALICONOMIC CONTRACTOR OF THE PROPERTY OF THE P	
	with Concepts, Confession	
lioned?	when the the marker	The training of
2. Review of sample protocol	37992 - Possiva Jes Cal	
ned sampler?	0	
2.2 Was a laboratory-provided TC sample bottle used?	Nondrassa - Sampler	
2.3 Was the aerator removed?	to stitute said xon	
2.4 Was the water tap flushed for at least 5 minutes?	sample stations	
2.5 Was the tap disinfected or flamed?	855 p to 10 10 to 10 to	
2.6 Did the sample get too warm prior to being placed on Dr. ice?	Desirtated wo win Smot of flence	
2.7 Was there other sampler error? Describe	sample into its chest	
2.8 If it is a seasonal system, were there any problems	To thing in the sor reported to start	
ously	the Ir.s colin hysolar	
	Wir brea HB soubs + fland.	

Page 1 of 6

Page 2 of 6

REVISED TOTAL COLIFORM RULE (RTCR) - LEVEL 2 ASSESSMENT

Coliform Rule (rTCR) [effective April 1, 2016]. Local regulatory agency (LPA) or Division of Drinking Water's District office will complete the Level 2 Assessment. To avoid a violation, an assessment report must be no later than 30 days after This form is intended to assist public water systems in completing the investigation required by the federal revised Total the trigger date.



Assessment Elements	z ≻	Z	Issue Description	Corrective Action Taken or Planned to be Taken and Date
3. Review of the distribution system.				
3.1 Have any mains been recently replaced or service lines recently added?] For rolled 1,2013 Whin	
3.2 Have fire hydrants or blow offs been recently flushed?	L E		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
3.3 Have valves been recently exercised to direct flow?	7		THE THE THE THE PARTY OF THE	
3.4 Any leaks or main breaks noted?	7		Court tout to sent	
3.5 Are all of the backflow prevention devices operational and maintained?			Geranolus as necess	
3.6 Was there a total loss of pressure, low pressure (<20 psi) or changes in water pressure? If yes, when?			arting 35-55 ps.	
3.7 Any areas of the distribution with low disinfectant levels (<0.2 mg/L)?		()		
3.8 Any recent pump station failures or repairs?		[-		
3.9 Air relief valve leaking?	7	7		
3.10 Standing water or debris in valve vault?				
3.11 Any recent power loss?	7			
3.12 Any unprotected cross connections (including yard hydrants and stock tanks)?				
3.13 Any other distribution issue not previously mentioned?	7			
4. Review of storage tank(s)				
4.1 Is there a presence of animals or insects in the tank(s)?				
4.2 Are there breaches or holes of any sort into tank(s)?				
4.3 Is there any presence of animal droppings around openings, vents or overflows?				
4.4 Is there sediment buildup and floating debris in tank(s)?				
4.5 Have the tank(s) been cleaned within the last 5 years? If not, list when it was last cleaned.				
4.6 Is there a #24 mesh screen installed on vents and overflows?				
4.7 Is the #24 mesh screen damaged or not properly installed?				
4.8 Is the overflow pipe directly connected to a tank drain, sanitary sewer or storm drain?				

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Corrective Action Taken or Planned to	be Taken and Date	120			97. 9 30	S To																					
Issue Description	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \		16.2 NIM	7 0.		からない からなっと としょうしゃ	6.6		t 3 1 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9	7/2	2 0 0 0			2 2 0	2 5	- (1.5)	5 2 5										
Z]						
Assessment Elements	4.9 Does the hatch have a solid, water proof, shoebox type lid that is properly sealed?	4.10 Was the hatch locked or secured?	4.11 Has the tank been accidently drained?	4.12 Have there been high flows through the tank?	4.13 Was there high water age in the tank (infrequent water use)?	4.14 Was the sample taken when the tank was at the low level mark?	4.15 Failure or improper operation on tank telemetry/altitude valves/controls?	4.16 Any recent repairs on the tank(s)?	4.17 Was there any power loss?	4.18 Was the tank vandalized or subject to tampering?	4.19 Any other storage tank issues not previously mentioned above?	5. Review of treatment process (if applicable)		time or have individual processes been interrupted by	power outages or other causes? If yes, provide details	on when, which processes and for how long?	5.2 Have there been any new treatment processes added	or new equipment installed?	5.3 Have there been any recent repairs of major unit processes or treatment equipment?	5.4 Have there been any changes in the operational	procedures used for treating the water such as,	changes in chemical dosages or changes in coagulant	and when it occurred.	5.5 Has a coagulant been added at all times the plant has been filtering water?	5.6 Have there been changes in raw water quality?	5.7 Was the finished water turbidity increasing?	5.8 Have filter clogging algae caused more frequent backwashing?

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Assessment Elements V N N N N	Issue Description	Corrective Action Taken or Planned to
		be Taken and Date
5.10 Has there been any vandalism or tampering at the		
5.11 Any other treatment plant issues not previously mentioned above?		
Sources – Well(s) $\mathcal{U}(\mathcal{U},\mathcal{U})$ 6. (Note the specific facility if any issues are found)		
2	Z	
6.2 Is the well cap defective or damaged or not water tight?		12-11 cal a 10-4-2
	the policy + inter	72
6.4 Is the vent screen damaged or not installed properly?	7	-
6.5 Does the vent and pump to waste terminate in an air app of at least three pipe diameters above the proposition.	なってまますり	
	Backin Fragment	
]]	Dos ontile to a	1) Orea x/2/20/20
6.8 Is the pitless adapter damaged?		
6.9 Is there a missing or damaged grout seal?		the factor the
6.10 Has there been any recent work performed on the		Drye of puno
velihead secured to prevent unauthorized		Stard S
access?		000
6.12 Have there been any sewer spills, source water spills or the manages near the well?		district you be
evidence of flooding?	ell leades from check vala	ading wish to.
	gon of reprine replica	3 0. 15.0 1 1. 1. 1. 1. 1. 1.
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	, (th 29 mash soles
6.15 Is there evidence of flooding or infiltration of surface \square	Kustal manifold	on castry vant
reloped or poorly	took by the that	(A) Seel well had we
ad animals near the spring?	detes	Car K
	to say to the to the	-ton
	s laxbast	

Coliform Rule (rTCR) [effective April 1, 2016]. Local regulatory agency (LPA) or Division of Drinking Water's District office This form is intended to assist public water systems in completing the investigation required by the federal revised Total will complete the Level 2 Assessment. To avoid a violation, an assessment report must be no later than 30 days after the trigger date.



Assessment Elements	z z >	N/A Issue Description	Corrective Action Taken or Planned to
6.18 Any other issues about springs not previously mentioned above?			be Taken and Date
Sources-purchased water			
6.19 Water quality issues with supplier?			
6.20 Low disinfectant residual from supplier (typically ≤0.02 mg/L)?			
6.21 Any other purchased water issues not previously mentioned above?			
Applicable to all sources	-		
6.22 Has an unapproved source been used?	7	5	
6.23 Has there been a change in sources?		a plan well his no in been bought outre	
6.24 Has there been recent rapid snowmelt, heavy rainfall or flooding?			
6.25 Any evidence of animals near the source?	>	LAC. L. D.	
6.26 Have there been algae blooms?			
6.27 Is the source water sample for ground water systems E. coli positive? This may indicate that the positive sample is originating from the source and may be a continuous source of contamination.			
6.28 Any other source issues not previously mentioned above?			
7. Significant Deficiencies		がある。 これのでは、 1980年代の日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の	
7.1 Are there any unaddressed significant deficiencies? This may indicate that the problem is known and is in the propess of being remedied. Include suppose		HP Tank comoded + Juliny (2) well 2	wedsto brophed
corrective action date and status of each corrective action.	<u>Z</u>	are when not swand C end cap	Call shen next wed
		NAK.	

Additional Comments:

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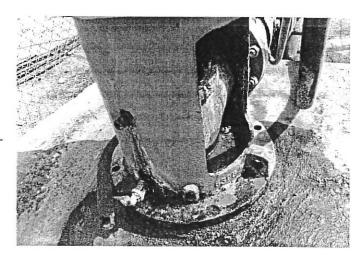
Coliform Rule (rTCR) [effective April 1, 2016]. Local regulatory agency (LPA) or Division of Drinking Water's District office will complete the Level 2 Assessment. To avoid a violation, an assessment report must be no later than 30 days after This form is intended to assist public water systems in completing the investigation required by the federal revised Total the trigger date.



					Comments					
ative completing the form (PRINTED): Shen Huang Date: $\P / 2 \ell / \ell S$		92465 Date: 8-21-16	shift operator 9		Yes No					
Name of SWRCB-Division of Drinking Water or LPA representative completing the form (PRINTED): Shen Huang Signature:	Water system responsible party (PRINTED): Matt Gomes, contract operator	(Signature: After Pluy Steve Ruges	34.4	Reserved for Regulatory Agency (DDW / LPA) Review		1. Has assessment been successfully completed?	2. Likely reason for EC+ occurrence has been found.	3. System has corrected the problem.	4. Corrective Action Approved?	

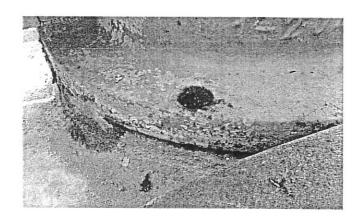
Deficiency #1:

Standing water present in the base of the vertical turbine pump due to inadequate drainage at Well No. 02A.



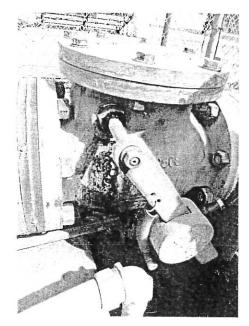
Deficiency #2:

Well head of Well No. 02A needs to be sealed.



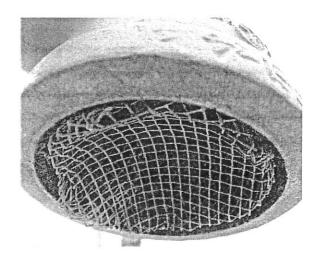
Deficiency #3:

Check valve is leaking on the above-ground manifold of Well No. 02A.



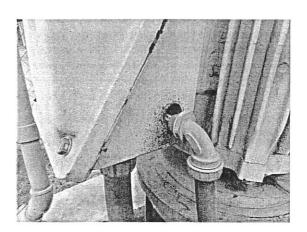
Deficiency #4:

Casing vent of Well No. 02A needs to be screened with #24 mesh.



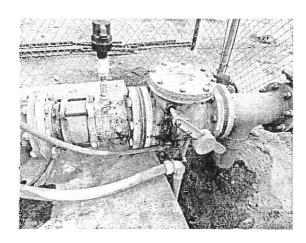
Deficiency #5:

Electrical motor connection box needs a lock nut at Well No. 02A.



Deficiency #6:

Above-ground manifold needs to be painted at Well No. 02A.



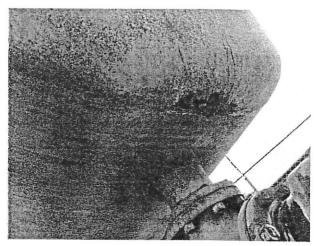
Deficiency #7:

Corroded air relief on hydropneumatic tank at Well No. 02A site needs to be replaced.



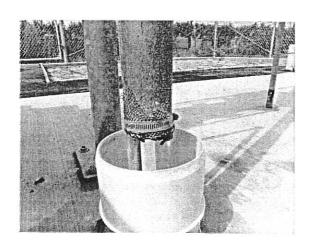
Deficiency #8 & 9:

Hydropneumatic tank at Well No. 02A has corrosion at the end cap seam.



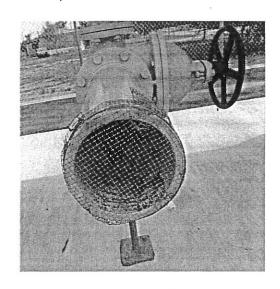
Deficiency #10:

Air relief at Well No. 04 needs to be screened with #24 mesh.



Deficiency #11:

Blow-off of the hydropneumatic tank at Well No. 04 site needs to be screened with #24 mesh.



Deficiency #12:

Hole in concrete floor at Well No. 04 site needs to be repaired.

